

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
:
- v. - : INFORMATION
:
GREG ZEHNER, : 19 Cr.
:
Defendant. :

USDC SDNY
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19 CRIM 485

COUNT ONE

(Narcotics Conspiracy)

The United States Attorney charges:

1. From at least in or about Fall 2015, up to and including in or about October 2016, in the Southern District of New York and elsewhere, GREG ZEHNER, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that GREG ZEHNER, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that GREG ZEHNER, the defendant, conspired to distribute and possess with intent to distribute was a quantity of mixtures and substances containing a

detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Narcotics Conspiracy)

The United States Attorney further charges:

4. From at least in or about Spring 2015, up to and including in or about Fall 2015, in the Southern District of New York and elsewhere, GREG ZEHNER, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that GREG ZEHNER, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substance that GREG ZEHNER, the defendant, conspired to distribute and possess with intent to distribute was a quantity of mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT THREE

(Conspiracy to Possess Narcotics Through Subterfuge)

The United States Attorney further charges:

7. From at least in or about Spring 2015, up to and including in or about Fall 2015, in the Southern District of New York and elsewhere, GREG ZEHNER, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

8. It was a part and an object of the conspiracy that GREG ZEHNER, the defendant, and others known and unknown, would and did acquire and obtain possession of a controlled substance by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

9. The controlled substance that GREG ZEHNER, the defendant, conspired to acquire and obtain through misrepresentation, fraud, forgery, deception, and subterfuge was a quantity of mixtures and substances containing a detectable amount of oxycodone.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH THREE

10. As the result of committing the offenses charged in Counts One through Three of this Information, GREG ZEHNER, the defendant, shall forfeit to the United States, pursuant to Title

21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision

11. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

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(21 U.S.C. § 846)

GEOFFREY S. BERMAN
United States Attorney.
